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November 16, 1998

EX PARTE

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex Parte Presentation in CC Docket No. 98-147

Dear Ms. Salas:

On November 13, 1998, representatives of Dakota Services, Ltd. ("DSL") participated in a telephone conference call with Dale Hatfield, Chief of the Office of Engineering and Technology. Representing DSL were Doug Zolnick and Thomas Jones. During the call we discussed two topics: (1) the substantial efficiencies DSL would realize if ILECs were required to permit competitive data providers to collocate integrated multiplexing and ATM packet distribution equipment (the substantial efficiencies are illustrated by the attached diagrams); and (2) a proposed definition of the packet distribution equipment which the FCC should require ILECs to permit CLECs to collocate (described in the attached "Definition of a Packet Distribution Device").

Two copies of this letter and the attached diagrams and paper will be filed in the above-referenced docket. If you have any questions, please call me at (202) 429-4732.

Sincerely,


Thomas Jones

Attachments

cc: Dale Hatfield
bcc: Douglas Sicker

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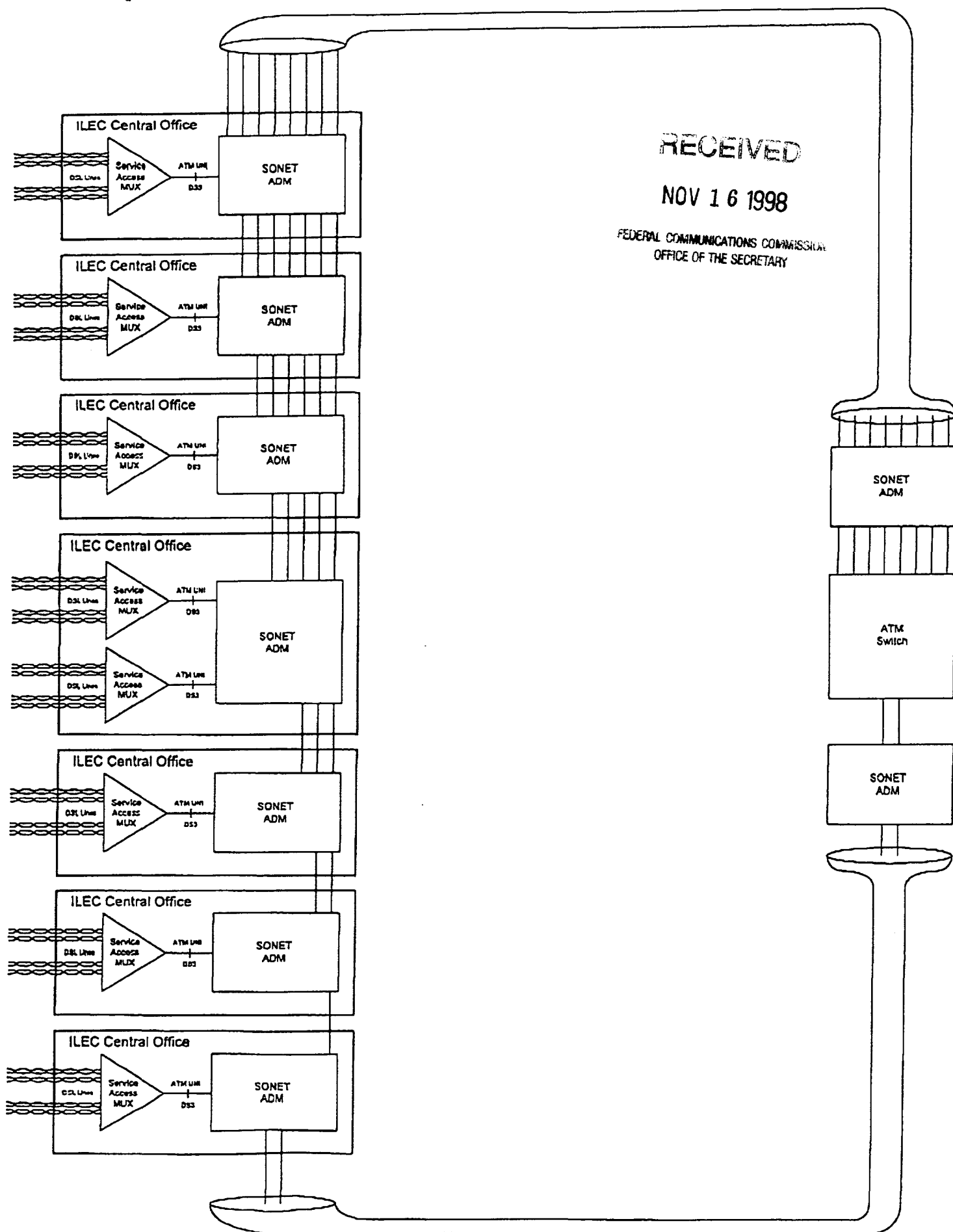


Figure A — packet distribution equipment not collocated

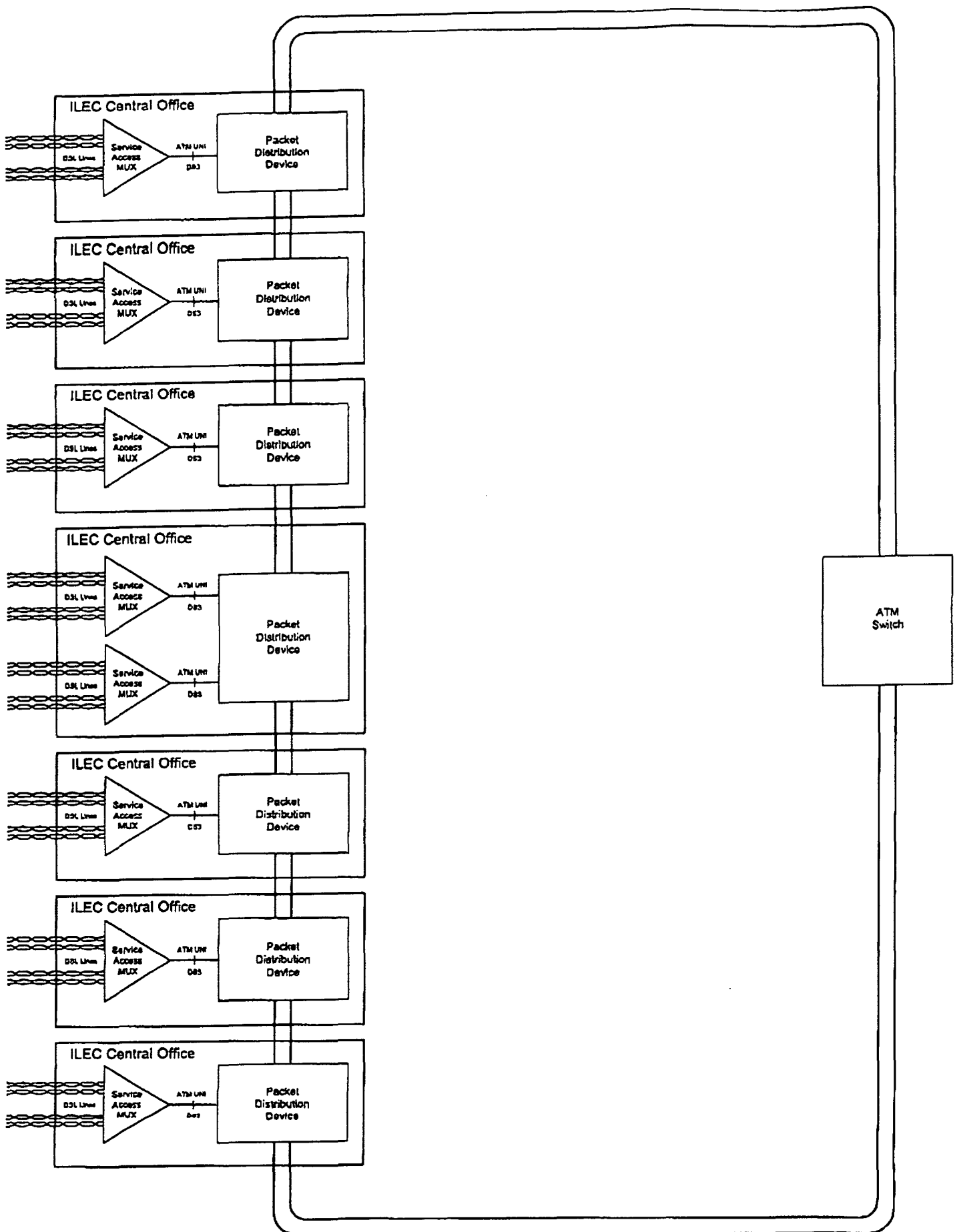


Figure B — packet distribution equipment collocated

Definition of a Packet Distribution Device

1) An ILEC Central Office-located, packet traffic distribution device which:

- provides interfaces for attaching and aggregating Central Office Service Access Multiplexors
- attaches directly to inter-office fiber rings with SMF interfaces
- performs virtual channel/virtual path cross-connection
- performs dynamic traffic distribution
- performs dynamic traffic load balancing
- performs virtual channel protection switching

This device allows connections between Service Access Multiplexors, and other Packet Distribution Devices, utilizing virtual channel, statistical multiplexing of customer traffic. The traffic distribution is dynamic, whereby channel connections and load distribution are determined by intelligent protocols designed for distributive multiplexing and cross-connecting (i.e., ATM PNNI).

2) The Packet Distribution Device does NOT:

- terminate twisted wire pair access lines/UNEs from the MDF
- provide switched services
- provide processing of call setup or perform call completion
- include an access signalling protocol (i.e., Q.2931)
- use STM, TDM or other channelized multiplexing techniques (i.e., SONET ADM)

Since the major attribute of a switch is the ability to perform call setup/termination, as well as terminate subscribe access lines/UNEs, this function is specifically excluded from the definition of a Packet Distribution Device.

The Packet Distribution Device, then, is an intelligent Cross-Connect/Dynamic Statistical Multiplexor and is not a Switch.